

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20707-MC-MARTINEZ-BECERRA

In re: Application Pursuant to
28 U.S.C. § 1782 of

FARHAD AZIMA,

Petitioner,

v.

INSIGHT ANALYSIS AND RESEARCH
LLC AND SDC-GADOT LLC,

Respondents.

**NOTICE OF DEPOSITION RULE 30(b)(6)
OF INSIGHT ANALYSIS AND RESEARCH LLC**

Please take notice that pursuant to Federal Rule of Civil Procedure 30(b)(6) and Judge Becerra's Minute Order of June 6, 2022 (D.E. 20), counsel for Petitioner, Farhad Azima, ("Azima") will take the deposition of Respondent, Insight Analysis and Research LLC ("Insight") at Carlton Fields, P.A., 700 NW 1st Avenue, Suite 1200, Miami FL 33136, on June 15, 2022, commencing at 10:00 AM. The deposition will be conducted remotely, using audio-visual conference technology. US Legal Support RemoteDepo Team will be providing an invitation link and instructions to the deposition. The deposition will continue until 2:00 PM and then from day to day between the hours of 10:00 AM and 5:00 PM until completed. The deposition will be used for purposes of *Farhad Azima -v- (1) RAKIA (2) David Neil Gerrard (3) Dechert LLP and (4) James Edward Deniston Buchanan* (Claim Number: HC-2016-002798), as described in the Application for Order to Take Discovery Pursuant to 28 U.S.C. Section 1782. ECF No. 1.

Pursuant to Rule 30(b)(6), Respondent Insight is directed to designate one or more persons to testify regarding the topics set forth in the attached Schedule A. In accordance with Rule 30(b)(6), counsel for Respondent shall contact undersigned counsel to confer in good faith about the matters for examination set forth in Schedule A. Respondent shall notify Petitioner's counsel no less than two business days prior to the deposition of the identity of all designees and the matters on which each person will testify.

Respectfully submitted,

Dated: June 8, 2022

/s/ Michael S. Pasano

Michael S. Pasano (FBN 475947)
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Vanessa Singh Johannes (FBN 1028744)
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Miami, Florida 33136-4118
Telephone: (305) 530-0050

/s/ Kirby D. Behre

Kirby D. Behre (admitted *pro hac vice*)
Timothy P. O'Toole (admitted *pro hac vice*)
Ian A. Herbert (admitted *pro hac vice*)
Calvin Lee (admitted *pro hac vice*)
MILLER & CHEVALIER CHARTERED
900 16th Street, NW
Washington, D.C. 20006
Telephone: (202) 626-5800
Fax: (202) 626-5801
Email: kbehre@milchev.com

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2022, I will cause a true and correct copy of the Rule 30(b)(6) Notice of Deposition to be sent by email to Shimon Goldberger, registered agent for Insight Analysis and Research LLC, at shimon@srsmanagement.com, and to be sent via Federal Express overnight delivery to the following addresses:

SDC-GADOT LLC
3200 Collins Ave.
Suite L2
Miami Beach, Florida 33140

/s/ Michael S. Pasano
Michael S. Pasano

SCHEDULE A
TOPICS

Pursuant to Rule 30(b)(6), Respondent, Insight Analysis and Research LLC (“Insight” or the “Company”) is directed to designate one or more persons who will testify on behalf of the Company and will be authorized to bind Insight with his or her deposition testimony about all matters known or reasonably available to Insight, including information, sources of information, communications, and documents, related to the following topics:

1. The formation of Insight;
2. The relationship of SDC-Gadot LLC to Insight Analysis and Research LLC;
3. The relationship of Insight to Gadot Information Services;
4. The identity and roles of all employees, officer, directors, managers, or other individuals associated with Insight, including but not limited to Amit Forlit and Alon Omri Gurlavie;
5. The identities and roles of any accountants, lawyers, and registered agents used by Insight, including but not limited to Ari Propis and Shimon Goldberger;
6. The nature of the work performed by Insight, who that work was performed for, and the individuals and companies used to perform that work;
7. The nature and extent of the work performed for Stuart Page, Page Group, Page Risk Management, or any other entities related to Stuart Page;
8. The account information related to Insight, including details of the bank accounts held by Insight, details regarding the transactions identified in Insight’s bank statements, and details regarding the use of debit cards held by Insight;
9. The nature and purpose of all transactions conducted by Insight, including but not limited to transactions conducted with the following entities: Yesodot, Page Group

- ME DMCC; Gadot Information Services; Dinka Analysis Services; Mona Tours Ltd.;
Brian Tulloch; King of Drums, Inc.; Ezekiel Golan Intellectual; Yeret;
SP.Zoo.Olhagaray Ltd.; Page Risk Management DMCC; JJPI Power and Energy
DMCC; Amit Forlit; Hayarkon 48 Hoatels Ltd.; Ariel Trading Ltd.; BHB Media
LLC; ASAF Adani; Global Impact Services LLC; SAS Luxury N Sight; Tekara
Cyber Solutions; DOVRA Hashimshoni;
10. The nature and extent of all business conducted in Florida by Insight, Amit Forlit, or
any other individuals associated with Insight, including but not limited to all
transactions with Florida companies, all transactions conducted in Florida, and all
property owned in Florida.
11. All work related to Farhad Azima, including but not limited to work regarding the
investigation of Mr. Azima and others affiliated with Mr. Azima, the hacking of Mr.
Azima and others affiliated with Mr. Azima, and the obtaining of Mr. Azima's
confidential data;
12. The litigation between Mr. Azima and Ras Al Khaimah Investment Authority in both
the United States and the United Kingdom, including but not limited to all meetings
related to that litigation in which an individual associated with Insight participated;
13. All interactions between anyone affiliated with Insight and anyone affiliated with Ras
Al Khaimah, Dechert LLP, Stewarts Law, Vital Management Services Inc., Grayson
+ Co. Ltd., Karv Communications, CyberRoot, and Majdi Halabi; and
14. The prior document and deposition subpoenas served in this proceeding and the
failure to comply with those subpoenas.

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Pursuant to Rule 30(b)(6), Respondent SDC-Gadot LLC is directed to designate one or more persons to testify regarding the topics set forth in the attached Schedule A. In accordance with Rule 30(b)(6), counsel for Respondent shall contact undersigned counsel to confer in good faith about the matters for examination set forth in Schedule A. Respondent shall notify Petitioner's counsel no less than two business days prior to the deposition of the identity of all designees and the matters on which each person will testify.

Respectfully submitted,

Dated: June 8, 2022

/s/ Michael S. Pasano

Michael S. Pasano (FBN 475947)
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Vanessa Singh Johannes (FBN 1028744)
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Counsel for Petitioner

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SDC-GADOT LLC
3200 Collins Ave.
Suite L2
Miami Beach, Florida 33140

/s/ Michael S. Pasano
Michael S. Pasano

SCHEDULE A
TOPICS

Pursuant to Rule 30(b)(6), Respondent SDC-Gadot LLC is directed to designate one or more persons who will testify on behalf of the Company and will be authorized to bind SDC-Gadot LLC with his or her deposition testimony about all matters known or reasonably available to SDC-Gadot LLC, including information, sources of information, communications, and documents, related to the following topics:

1. The formation of SDC-Gadot LLC;
2. The relationship of SDC-Gadot LLC to Insight Analysis and Research LLC;
3. The relationship of SDC-Gadot LLC to Gadot Information Services;
4. The identity and roles of all employees, officer, directors, managers, or other individuals associated with SDC-Gadot LLC, including but not limited to Amit Forlit and Alon Omri Gurlavie;
5. The identities and roles of any accountants, lawyers, and registered agents used by SDC-Gadot LLC, including but not limited to Ari Propis and Shimon Goldberger;
6. The nature of the work performed by SDC-Gadot LLC, who that work was performed for, and the individuals and companies used to perform that work;
7. The nature and extent of the work performed for Stuart Page, Page Group, Page Risk Management, or any other entities related to Stuart Page;
8. The account information related to SDC-Gadot LLC, including details of the bank accounts held by SDC-Gadot LLC, details regarding the transactions identified in SDC-Gadot LLC's bank statements, and details regarding the use of debit cards held by SDC-Gadot LLC;

9. The nature and purpose of all transactions conducted by SDC-Gadot LLC, including but not limited to transactions conducted with the following entities: Insight Analysis & Research LLC; Page Group ME DMCC; Florida IP Telecom Inc.; Overseas Consulting; optimizerx; Page Risk Management DMCC; Txt Tecno Servicios SA de CV; Blenheim Investment Holding Vietna; Global Impact Services LLC; Fusion GPS; Olam Hamachshevim; Aviram Hawk Consultant; Gadot Information Services; Sharon Hashimshoni; BMI Analysis Limited; Liv Consulting Ltd.; David Shnaider; Mona Tours Ltd.; Ezekiel Golan Intellectual Pro; Dinka Analysis Services; KMI Ground Inc.; MMCO LLC t/a Don Rosen Imports; RMDY Health Inc.; PandaFace Ltd.; Shira Betzalel; and TPV Inventa Trading S.R.O.
10. The nature and extent of all business conducted in Florida by SDC-Gadot LLC, Amit Forlit, or any other individuals associated with SDC-Gadot LLC, including but not limited to all transactions with Florida companies, all transactions conducted in Florida, and all property owned in Florida.
11. All work related to Farhad Azima, including but not limited to work regarding the investigation of Mr. Azima and others affiliated with Mr. Azima, the hacking of Mr. Azima and others affiliated with Mr. Azima, and the obtaining of Mr. Azima's confidential data;
12. The litigation between Mr. Azima and Ras Al Khaimah Investment Authority in both the United States and the United Kingdom, including but not limited to all meetings related to that litigation in which an individual associated with SDC-Gadot LLC participated;

13. All interactions between anyone affiliated with SDC-Gadot LLC and anyone affiliated with Ras Al Khaimah, Dechert LLP, Stewarts Law, Vital Management Services Inc., Grayson + Co. Ltd., Karv Communications, CyberRoot, and Majdi Halabi; and
14. The prior document and deposition subpoenas served in this proceeding and the failure to comply with those subpoenas.